

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

IN RE AUTOMOTIVE PARTS ANTITRUST LITIGATION	:	Master File No. 12-md-02311
	:	Honorable Marianne O. Battani
	:	
THIS DOCUMENT RELATES TO:	:	LANGHAM DECLARATION IN
	:	SUPPORT OF END-PAYOR
ALL END-PAYOR ACTIONS	:	PLAINTIFFS' RESPONSE TO
	:	FINANCIAL RECOVERY
	:	STRATEGIES' REQUEST FOR
	:	DECLARATORY RELIEF
	:	REGARDING AUTOMOBILE
	:	INSURER'S CLAIMED RIGHT TO
	:	SHARE IN THE PROCEEDS OF
	:	THE END-PAYOR PLAINTIFFS'
	:	SETTLEMENTS

1. My name is Chanler A. Langham. I am over the age of twenty-one (21) years, am competent to testify to the matters stated herein, have personal knowledge of the facts and statements in this declaration, and each of the facts and statements is true and correct.

2. I am an attorney in the law firm of Susman Godfrey L.L.P. I am licensed to practice law in the state of Texas and before this Court. I am counsel of record for the End Payor Plaintiffs in the above-referenced litigation.

3. Attached as Exhibits 1-3 to this declaration are true and correct copies of the following:

- X-1 Liberty Mutual Insurance Company's LibertyGuard Auto Policy
- X-2 GEICO's Personal Automobile Insurance Policy
- X-3 Mercury Insurance Group's Policy Provisions

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 16, 2020, in Houston, Texas.

/s/ Chanler A. Langham  
Chanler A. Langham